# **EXHIBIT A**

#### IN THE UNITED STATES BANKRUPTCY COURT

#### FOR THE DISTRICT OF DELAWARE

In re:		Chapter 11
W. R. GRACE & CO., et al., 1	)	Case No. 01-1139 (JKF) Jointly Administered
Debtors.	)	
	)	Objection Due By: April 22, 2002 at 4:00 p.m.
	)	Hearing Date: Hearing will be held if necessary

#### NOTICE OF FILING OF FEE APPLICATION

To: (1) The Debtors; (2) Office of the United States Trustee; (3) Counsel to the Official Committee of Unsecured Creditors; (4) Counsel to the Official Committee of Personal Injury Claimants; (5) Counsel to the Official Committee of Property Damage Claimants; (6) Counsel to the debtor-in-possession lenders (the "DIP Lenders"); and (7) Counsel to the Official Committee of Equity Holders.

Pachulski, Stang, Ziehl, Young & Jones P.C., co-counsel to the above-captioned debtors and debtors in possession (collectively, the "Debtors"), has filed and served the Tenth Monthly Application of Pachulski, Stang, Ziehl, Young & Jones P.C. for Compensation for Services Rendered and Reimbursement of Expenses as Co-Counsel to the Debtors for the Period

<sup>1</sup> The Debtors consist of the following 62 entities: W. R. Grace & Co. (f/k/a Grace Specialty Chemicals, Inc.), W. R. Grace & Co.-Conn., A-1 Bit & Tool Co., Inc., Alewife Boston Ltd., Alewife Land Corporation, Amicon, Inc., CB Biomedical, Inc. (f/k/a Circe Biomedical, Inc.), CCHP, Inc., Coalgrace, Inc., Coalgrace II, Inc., Creative Food 'N Fun Company, Darex Puerto Rico, Inc., Del Taco Restaurants, Inc., Dewey and Almy, LLC (f/k/a Dewey and Almy Company), Ecarg, Inc., Five Alewife Boston Ltd., G C Limited Partners I, Inc. (f/k/a Grace Cocoa Limited Partners I, Inc.), G C Management, Inc. (f/k/a Grace Cocoa Management, Inc.), GEC Management Corporation, GN Holdings, Inc., GPC Thomasville Corp., Gloucester New Communities Company, Inc., Grace A-B Inc., Grace A-B II Inc., Grace Chemical Company of Cuba, Grace Culinary Systems, Inc., Grace Drilling Company, Grace Energy Corporation, Grace Environmental, Inc., Grace Europe, Inc., Grace H-G Inc., Grace H-G II Inc., Grace Hotel Services Corporation, Grace International Holdings, Inc. (f/k/a Dearborn International Holdings, Inc.), Grace Offshore Company, Grace PAR Corporation, Grace Petroleum Libya Incorporated, Grace Tarpon Investors, Inc., Grace Ventures Corp., Grace Washington, Inc., W. R. Grace Capital Corporation, W. R. Grace Land Corporation, Gracoal, Inc., Gracoal II, Inc., Guanica-Caribe Land Development Corporation, Hanover Square Corporation, Honico International, Inc., Kootenai Development Company, L B Realty, Inc., Litigation Management, Inc. (f/k/a GHSC Holding, Inc., Grace JVH, Inc., Asbestos Management, Inc.), Monolith Enterprises, Incorporated, Monroe Street, Inc., MRA Holdings Corp. (f/k/a Nestor-BNA Holdings Corporation), MRA Intermedeo, Inc. (f/k/a Nestor-BNA, Inc.), MRA Staffing Systems, Inc. (f/k/a British Nursing Association, Inc.), Remedium Group, Inc. (f/k/a Environmental Liability Management, Inc., E&C Liquidating Corp., Emerson & Cuming, Inc.), Southern Oil, Resin & Fiberglass, Inc., Water Street Corporation, Axial Basin Ranch Company, CC Partners (f/k/a Cross Country Staffing), Hayden-Gulch West Coal Company, H-G Coal Company.

From January 1, 2002 through January 31, 2002, seeking fees in the amount of \$48,356.50 and expenses in the amount of \$38,671.08 (the "Fee Application").

Objections or responses to the Fee Application, if any, must be made in writing, filed with the United States Bankruptcy Court for the District of Delaware, Marine Midland Plaza, 824 Market Street, Wilmington, Delaware 19801, on or before April 22, 2002, at 4:00 p.m. Eastern Time.

At the same time, you must also serve a copy of the objections or responses, if any, upon the following: (i) co-counsel for the Debtors, James H.M. Sprayregen, Esquire, Kirkland & Ellis, 200 East Randolph Drive, Chicago, Illinois 60601 (fax number 312-861-2200), and Laura Davis Jones, Esquire, Pachulski, Stang, Ziehl, Young & Jones P.C., 919 North Market Street, Suite 1600, P.O. Box 8705, Wilmington, DE 19899-8705 (Courier 19801) (fax number 302-652-4400); (ii) counsel to the Official Committee of Unsecured Creditors, Lewis Kruger, Esquire, Stroock & Stroock & Lavan, 180 Maiden Lane, New York, New York 10038-4982 (fax number 212-806-6006), and Michael R. Lastowski, Esquire, Duane, Morris & Heckscher, LLP, 1100 N. Market Street, Suite 1200, Wilmington, Delaware 19801-1246 (fax number 302-657-4901); (iii) counsel to the Official Committee of Property Damage Claimants, Scott L. Baena, Esquire, Bilzin, Sumberg, Dunn, Baena, Price & Axelrod, First Union Financial Center, 200 South Biscayne Boulevard, Suite 2500, Miami, Florida 33131 (fax number 305-374-7593), and Michael B. Joseph, Esquire, Ferry & Joseph, P.A., 824 Market Street, Suite 904, P.O. Box 1351, Wilmington, Delaware 19899 (fax number 302-575-1714); (iv) counsel to the Official Committee of Personal Injury Claimants, Elihu Inselbuch, Esquire, Caplin & Drysdale, 399 Park Avenue, 36th Floor, New York, New York 10022 (fax number 212-644-6755), and Matthew G.

Zaleski, III, Esquire, Campbell & Levine, LLC, Chase Manhattan Centre, 15<sup>th</sup> Floor, 1201
Market Street, Suite 1500, Wilmington, Delaware 19801 (fax number 302-426-9947); (v)
counsel to the DIP Lenders, J. Douglas Bacon, Esquire, Latham & Watkins, Sears Tower, Suite
5800, Chicago, Illinois 60606 (fax number 312-993-9767), and Steven M. Yoder, Esquire, The
Bayard Firm, 222 Delaware Avenue, Suite 900, P.O. Box 25130, Wilmington, Delaware 19899
(fax number 302-658-6395); (vi) the Office of the United States Trustee, Attn: Frank J. Perch,
Esquire, 844 N. King Street, Wilmington, Delaware 19801 (fax number 302-573-6497); and
(vii) co-counsel to the Official Committee of Equity Holders, Thomas M. Mayer, Esquire,
Kramer Levin Naftalis & Frankel LLP, 919 Third Avenue, New York, New York 10022 (fax number 212-715-8000) and Teresa K.D. Currier, Esquire, Klett, Rooney, Lieber, & Schorling,
1000 West Street, Suite 1410, Wilmington, DE 19801 (fax number 302-552-4295).

A HEARING ON THE FEE APPLICATION WILL BE HELD ONLY IF OBJECTIONS OR RESPONSES ARE FILED.

IF YOU FAIL TO RESPOND OR OBJECT IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE FEE APPLICATION WITHOUT FURTHER NOTICE OR HEARING.

Dated: March 29, 2002

PACHULSKI, STANG, ZIEHL, YOUNG & JONES P.C.

Laura Davis Jones (Bar No. 2436)

Hamid R. Rafatjoo (California Bar No. 181564)

David W. Carickhoff Jr. (Bar No. 3715) 919 North Market Street, 16th Floor

P.O. Box 8705

Wilmington, DE 19899-8705 (Courier 19801)

Telephone: (302) 652-4100 Facsimile: (302) 652-4400

Co-counsel for Debtors and Debtors in Possession

#### IN THE UNITED STATES BANKRUPTCY COURT

#### FOR THE DISTRICT OF DELAWARE

In re:	)	Chapter 11
W. R. GRACE & CO., <u>et al.</u> , <sup>1</sup>	)	Case No. 01-1139 (JKF) Jointly Administered
Debtors.	)	Jointly Hammington

TENTH MONTHLY APPLICATION OF
PACHULSKI, STANG, ZIEHL, YOUNG & JONES P.C.
FOR COMPENSATION FOR SERVICES RENDERED AND
REIMBURSEMENT OF EXPENSES AS CO-COUNSEL TO THE DEBTORS
FOR THE PERIOD FROM JANUARY 1, 2002 THROUGH JANUARY 31, 2002

Name of Applicant: Pachulski, Stang, Ziehl, Young & Jones P.C. ("PSZY&J").

<u>Authorized to Provide Professional Services to</u>: The above-captioned debtors and debtors-in-possession.

Date of Retention: May 3, 2001.

<u>Period for which Compensation and Reimbursement is Sought</u>: January 1, 2002 through January 31, 2002.

Amount of Compensation Sought as Actual, Reasonable and Necessary: \$48,356.50.

Amount of Expense Reimbursement Sought as Actual, Reasonable, and Necessary: \$38,671.08.

<sup>&</sup>lt;sup>1</sup> The Debtors consist of the following 62 entities: W. R. Grace & Co. (f/k/a Grace Specialty Chemicals, Inc.), W. R. Grace & Co.-Conn., A-1 Bit & Tool Co., Inc., Alewife Boston Ltd., Alewife Land Corporation, Amicon, Inc., CB Biomedical, Inc. (f/k/a Circe Biomedical, Inc.), CCHP, Inc., Coalgrace, Inc., Coalgrace II, Inc., Creative Food 'N Fun Company, Darex Puerto Rico, Inc., Del Taco Restaurants, Inc., Dewey and Almy, LLC (f/k/a Dewey and Almy Company), Ecarg, Inc., Five Alewife Boston Ltd., G C Limited Partners I, Inc. (f/k/a Grace Cocoa Limited Partners I, Inc.), G C Management, Inc. (f/k/a Grace Cocoa Management, Inc.), GEC Management Corporation, GN Holdings, Inc., GPC Thomasville Corp., Gloucester New Communities Company, Inc., Grace A-B Inc., Grace A-B II Inc., Grace Chemical Company of Cuba, Grace Culinary Systems, Inc., Grace Drilling Company, Grace Energy Corporation, Grace Environmental, Inc., Grace Europe, Inc., Grace H-G Inc., Grace H-G II Inc., Grace Hotel Services Corporation, Grace International Holdings, Inc. (f/k/a Dearborn International Holdings, Inc.), Grace Offshore Company, Grace PAR Corporation, Grace Petroleum Libya Incorporated, Grace Tarpon Investors, Inc., Grace Ventures Corp., Grace Washington, Inc., W. R. Grace Capital Corporation, W. R. Grace Land Corporation, Gracoal, Inc., Gracoal II, Inc., Guanica-Caribe Land Development Corporation, Hanover Square Corporation, Homco International, Inc., Kootenai Development Company, L B Realty, Inc., Litigation Management, Inc. (f/k/a GHSC Holding, Inc., Grace JVH, Inc., Asbestos Management, Inc.), Monolith Enterprises, Incorporated, Monroe Street, Inc., MRA Holdings Corp. (f/k/a Nestor-BNA Holdings Corporation), MRA Intermedco, Inc. (f/k/a Nestor-BNA, Inc.), MRA Staffing Systems, Inc. (f/k/a British Nursing Association, Inc.), Remedium Group, Inc. (f/k/a Environmental Liability Management, Inc., E&C Liquidating Corp., Emerson & Cuming, Inc.), Southern Oil, Resin & Fiberglass, Inc., Water Street Corporation, Axial Basin Ranch Company, CC Partners (f/k/a Cross Country Staffing), Hayden-Gulch West Coal Company, H-G Coal Company.

This is a:

xx monthly

\_\_ interim

\_ final application.

The total time expended for preparation of this fee application is approximately

2.00 hours and the corresponding compensation requested is approximately \$800.00.2

Prior Applications Filed:

Date	Period	Requested	Requested	Approved	Approved
Filed	Covered	Fees	<u>Expenses</u>	<u>Fees</u>	Expenses
07/10/01	4/2/01-	\$62,472.75	\$23,277.13	\$62,472.75	\$23,277.13
	4/30/01				
08/09/01	5/1/01-	\$29,929.00	\$15,670.64	\$29,929.00	\$15,670.64
	5/31/01				
09/07/01	6/1/01-	\$30,195.50	\$37,763.45	\$30,195.50	\$37,763.45
	6/30/01		<u>-</u>		
09/11/01	7/1/01-	\$17,040.50	\$20,323.76	\$17,040.50	\$20,323.76
	7/31/01				
10/31/01	8/1/01-	\$ 9,407.50	\$20,486.61	\$ 9,407.50	\$20,486.61
	8/31/01	_	-		
11/13/01	9/1/01-	\$13,158.00	\$10,035.46	\$13,158.00	\$10,035.46
	9/30/01				
11/27/01	10/1/01-	\$13,420.75	\$ 8,922.92	\$13,420.75	\$ 8,922.92
annovine and a second	10/31/01				
1/22/02	11/1/01-	\$39,991.50	\$22,398.11	\$39,991.50	\$22,398.11
	11/30/01				
1/30/02	12/1/01-	\$35,017.00	\$13,575.07	\$35,017.00	\$13,575.07
	12/31/01				

 $<sup>^2</sup>$  The actual number of hours expended preparing this Application and the corresponding compensation requested will be set forth in PSZY&J's subsequent fee applications.

Name of Professional Individual	Position of the Applicant, Number of years in that Position, Prior Relevant Experience, Year of Obtaining License to Practice, Area of Expertise	Hourly Billing Rate (including changes)	Total Hours Billed <sup>3</sup>			
Laura Davis Jones	Shareholder 2000; Joined Firm 2000; Member of DE Bar since 1986	\$550.00	15.50	\$ 8,525.00		
Ira D. Kharasch	Shareholder 1987; Member of CA Bar since 1982	\$480.00	.90	\$ 432.00		
Hamid R. Rafatjoo	Associate 2000; Member of CA Bar since 1995	\$330.00	5.20	\$ 1,716.00		
David W. Carickhoff	Associate 2001; Member of DE Bar since 1998	\$280.00 \$140.00	94.20 9.40	\$26,376.00 \$ 1,316.00		
Rachel S. Lowy	Associate 2000; Member of DE Bar since 1998	\$260.00	1.10	\$ 286.00		
Michael P. Migliore	Associate 2001	\$215.00	1.00	\$ 215.00		
Laurie A. Gilbert	Paralegal since 1983	\$125.00	1.40	\$ 175.00		
Patricia E. Cuniff	Paralegal since 1998	\$120.00	50.40	\$ 6,048.00		
Cheryl A. Knotts	Paralegal since2000	\$120.00	.10	\$ 12.00		
Donna C. Crossan	Case Management Assistant 2000	\$ 55.00	11.50	\$ 632.50		
Violet E. Mobley	Case Management Assistant 2000	\$ 50.00	34.70	\$ 1,735.00		
Christina M. Shaeffer	Case Management Assistant 2001	\$ 40.00	15.30	\$ 612.00		
Jason M. Griffith	Case Management Assistant 2001	\$ 40.00	.40	\$ 16.00		
Charles J. Bouzoukis	Case Management Assistant 2002	\$ 40.00	6.50	\$ 260.00		

Grand Total \$48,356.50 Total Hours 247.60

Blended Rate: \$195.30

<sup>&</sup>lt;sup>3</sup> Some professional time that was spent during the Interim Period will be reflected in a subsequent application and some professional time that was spent during the previous Interim Period is reflected in this Application.

# COMPENSATION BY PROJECT CATEGORY

Project Category	Total Hours	Total Fees Requested
Asset Disposition	2.00	\$ 560.00
Bankruptcy Litigation	132.10	\$29,680.00
Case Administration	52.30	\$ 3,831.50
Claims Administration/Objections	2.50	\$ 476.00
Compensation of Professionals	39.00	\$ 9,166.00
Executory Contracts	3.70	\$ 764.00
Financial Filings	4.70	\$ 1,316.00
Litigation (Non-Bankruptcy)	.60	\$ 168.00
Operations	2.20	\$ 440.00
Plan & Disclosure Statement	2.10	\$ 444.00
Retention of Professionals	6.40	\$ 1,511.00
TOTAL	247.60	\$48,356.50

# **EXPENSE SUMMARY**

Expense Category	Service Provider <sup>4</sup> (If Applicable)	Total Expenses
Travel Expense	Eagle Limo	\$ 297.20
Facsimile (\$1.00/page)		\$ 1,102.00
Reproduction (@\$.15 per page)		\$23,339.75
Delivery/Courier Service	DDI	\$ 4,489.72
Express Mail	Federal Express/DHL	\$ 6,014.87
Postage		\$ 1,643.45
Transcript	J & J	\$ 174.25
Conference Call		\$ 1,167.62
Working Meals	Grotto's Pizza	\$ 177.92
Overtime		\$ 188.07
Legal Research	Pacer	\$ 76.23
TOTAI		\$38.671.08

<sup>&</sup>lt;sup>4</sup> PSZY&J may use one or more service providers. The service providers identified herein are the primary service providers for the categories described.

# IN THE UNITED STATES BANKRUPTCY COURT

#### FOR THE DISTRICT OF DELAWARE

In re:	)	Chapter 11
	)	
W. R. GRACE & CO., et al.,1	)	Case No. 01-1139 (JKF)
· <del></del>	)	Jointly Administered
Debtors.	)	

TENTH MONTHLY APPLICATION OF
PACHULSKI, STANG, ZIEHL, YOUNG & JONES P.C.
FOR COMPENSATION FOR SERVICES RENDERED AND
REIMBURSEMENT OF EXPENSES AS CO-COUNSEL TO THE DEBTORS
FOR THE PERIOD FROM JANUARY 1, 2002 THROUGH JANUARY 31, 2002

Pursuant to sections 330 and 331 of title 11 of the United States Code (the "Bankruptcy Code"), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), and the Court's Administrative Order Pursuant to Sections 105(a) and 331 of the Bankruptcy Code Establishing Procedures for Allowance and Payment of Monthly Interim Compensation and Reimbursement of Expenses of Professionals, entered May 3, 2001 (the "Administrative Order"), Pachulski, Stang, Ziehl, Young & Jones P.C. ("PSZY&J") hereby files this Tenth Monthly Application of Pachulski, Stang, Ziehl, Young & Jones P.C. for

<sup>1</sup> The Debtors consist of the following 62 entities: W. R. Grace & Co. (f/k/a Grace Specialty Chemicals, Inc.), W. R. Grace & Co.-Conn., A-1 Bit & Tool Co., Inc., Alewife Boston Ltd., Alewife Land Corporation, Amicon, Inc., CB Biomedical, Inc. (f/k/a Circe Biomedical, Inc.), CCHP, Inc., Coalgrace, Inc., Coalgrace II, Inc., Creative Food 'N Fun Company, Darex Puerto Rico, Inc., Del Taco Restaurants, Inc., Dewey and Almy, LLC (f/k/a Dewey and Almy Company), Ecarg, Inc., Five Alewife Boston Ltd., G C Limited Partners I, Inc. (f/k/a Grace Cocoa Limited Partners I, Inc.), G C Management, Inc. (f/k/a Grace Cocoa Management, Inc.), GEC Management Corporation, GN Holdings, Inc., GPC Thomasville Corp., Gloucester New Communities Company, Inc., Grace A-B Inc., Grace A-B II Inc., Grace Chemical Company of Cuba, Grace Culinary Systems, Inc., Grace Drilling Company, Grace Energy Corporation, Grace Environmental, Inc., Grace Europe, Inc., Grace H-G II Inc., Grace Hotel Services Corporation, Grace International Holdings, Inc. (f/k/a Dearborn International Holdings, Inc.), Grace Offshore Company, Grace PAR Corporation, Grace Petroleum Libya Incorporated, Grace Tarpon Investors, Inc., Grace Ventures Corp., Grace Washington, Inc., W. R. Grace Capital Corporation, W. R. Grace Land Corporation, Gracoal, Inc., Gracoal II, Inc., Guanica-Caribe Land Development Corporation, Hanover Square Corporation, Homco International, Inc., Kootenai Development Company, L B Realty, Inc., Litigation Management, Inc. (f/k/a GHSC Holding, Inc., Grace JVH, Inc., Asbestos Management, Inc.), Monolith Enterprises, Incorporated, Monroe Street, Inc., MRA Holdings Corp. (f/k/a Nestor-BNA Holdings Corporation), MRA Intermedeo, Inc. (f/k/a Nestor-BNA, Inc.), MRA Staffing Systems, Inc. (f/k/a British Nursing Association, Inc.), Remedium Group, Inc. (f/k/a Environmental Liability Management, Inc., E&C Liquidating Corp., Emerson & Cuming, Inc.), Southern Oil, Resin & Fiberglass, Inc., Water Street Corporation, Axial Basin Ranch Company, CC Partners (f/k/a Cross Country Staffing), Hayden-Gulch West Coal Company, H-G Coal Company.

Compensation for Services Rendered and Reimbursement of Expenses as Co-counsel to the Debtors for the Period from January 1, 2002 through January 31, 2002 (the "Application"). By this Application PSZY&J seeks a monthly interim allowance of compensation in the amount of \$38,671.08 and reimbursement of actual and necessary expenses in the amount of \$48,356.50 for a total of \$87,027.58 for the period January 1, 2002 through January 31, 2002 (the "Interim Period"). In support of this Application, PSZY&J respectfully represents as follows:

#### Background

- 1. On April 2, 2001, each of the Debtors (collectively, the "Debtors") filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code"). Pursuant to Sections 1107 and 1108 of the Bankruptcy Code, Debtors are continuing to operate their businesses and manage their properties and assets as debtors in possession. Since the Petition Date, the U.S. Trustee has appointed the following committees: Official Committee of Unsecured Creditors, Official Committee of Asbestos Personal Injury Claimants, Official Committee of Asbestos Property Damage Claimants, and the Official Committee of Equity Security Holders (collectively, the "Committees"). No trustee has been appointed in Debtors' chapter 11 cases.
- 2. The Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2).
- 3. On April 2, 2001, the Court entered its order that Debtors' chapter 11 cases be consolidated for procedural purposes only and administered jointly.

- 4. By this Court's order dated May 3, 2001, Debtors were authorized to retain PSZY&J as their counsel, effective as of April 2, 2001, with regard to the filing and prosecution of their Chapter 11 cases, and all related matters (the "Retention Order"). The Retention Order authorizes Debtors to compensate PSZY&J at PSZY&J's hourly rates charged for services of this type and to be reimbursed for actual and necessary out-of-pocket expenses that it incurred, subject to application to this Court in accordance with the Bankruptcy Code, the Federal Rules of Bankruptcy Procedure, all applicable local rules and orders of this Court.
- 5. On May 3, 2001, the Court entered its Administrative Order establishing procedures for interim compensation and reimbursement of expenses of professionals. Pursuant to the procedures set forth in that Administrative Order, professionals may request monthly compensation and reimbursement, and interested parties may object to such requests. If no interested party objects to a professional's request within twenty (20) days, the applicable professional may submit to the Court a certification of no objection authorizing the interim compensation and reimbursement of eighty percent (80%) of the fees requested and 100% of the expenses requested, subject to the filing and approval of interim and final fee applications of the professional.

# Compensation Paid and Its Source

- 6. All Services for which PSZY&J requests compensation were performed for or on behalf of Debtors.
- 7. Except for the amounts paid to PSZY&J pursuant to previously approved monthly interim applications for compensation and reimbursement, if any, or a retainer, PSZY&J

has received no payment and no promises for payment from any source for services rendered or to be rendered in any capacity whatsoever in connection with the matters covered by this Application. There is no agreement or understanding between PSZY&J and any other person other than the shareholders of PSZY&J for the sharing of compensation to be received for services rendered in these cases.

#### Fee Statements

The fee statement for the Interim Period is attached hereto as Exhibit A.

This statement contains daily time logs describing the time spent by each attorney and paraprofessional during the Interim Period.<sup>2</sup> To the best of PSZY&J's knowledge, this Application complies with Sections 330 and 331 of the Bankruptcy Code, the Bankruptcy Rules, the Administrative Order, and the Local Rules of Bankruptcy Practice and Procedure for the United States Bankruptcy Court for the District of Delaware (the "Delaware Local Rules").

PSZY&J's time reports are initially handwritten or typewritten by the attorney or paralegal performing the described services. The time reports are organized on a daily basis. PSZY&J is particularly sensitive to issues of "lumping," and unless time was spent in one time frame on a variety of different matters for a particular client, separate time entries are set forth in the time reports. PSZY&J's charges for its professional services are based upon the time, nature, extent and value of such services and the cost of comparable services other than in a case under the Bankruptcy Code. PSZY&J has reduced its charges related to any non-working "travel time" to

<sup>&</sup>lt;sup>2</sup>However, some professional time that was spent during the Interim Period will be reflected in a subsequent application, and some professional time that was spent during a period prior to the Interim Period will be reflected in this Application.

50% of PSZY&J's standard hourly rate. To the extent it is feasible, PSZY&J attempts to work during travel.

# **Actual and Necessary Expenses**

- 9. A summary of actual and necessary expenses incurred by PSZY&J for the Interim Period is attached hereto as part of Exhibit A. PSZY&J customarily charges \$0.15 per page for photocopying expenses related to cases, such as this one, arising in Delaware.

  PSZY&J's photocopying machines automatically record the number of copies made when the person that is doing the copying enters the client's account number into a device attached to the photocopier. PSZY&J summarizes each client's photocopying charges on a daily basis.
- 10. PSZY&J charges \$1.00 per page for out-going facsimile transmissions. There is no additional charge for long distance telephone calls on faxes. The charge for outgoing facsimile reflects PSZY&J's calculation of the actual costs incurred by PSZY&J for the machines, supplies and extra labor expenses associated with sending telecopies and is reasonable in relation to the amount charged by outside vendors who provide similar services. PSZY&J does not charge fax receipts to Debtors in these cases.
- 11. Regarding Providers of on-line legal research (e.g., LEXIS and WESTLAW), PSZY&J charges the standard usage rates these providers charge for computerized legal research. PSZY&J bills its clients the actual cash charged by such services, with no premium. Any volume discount received by PSZY&J is passed on to the client.
- 12. PSZY&J believes the foregoing rates are the market rates that the majority of law firms charge clients for such services. In addition, PSZY&J believes that such charges are

in accordance with the American Bar Association's ("ABA") guidelines, as set forth in the ABA's Statement of Principles, dated January 12, 1995, regarding billing for disbursements and other charges.

# **Summary of Services Rendered**

professional services in these cases for which PSZY&J seeks compensation are as follows:

Laura Davis Jones, Hamid R. Rafatjoo, Ira D. Kharasch, David W. Carickhoff, Rachel S. Lowy and Michael P. Migliore. The paraprofessionals of PSZY&J who provided services to these attorneys in these cases are paralegals Laurie A. Gilbert, Patricia E. Cuniff and Cheryl A. Knotts. The case management assistants are Donna C. Crossan, Violet E. Mobley, Jason M. Griffith and Christina M. Shaeffer and Charles J. Bouzoukis. PSZY&J, by and through the above-named persons, has prepared and assisted in the preparation of various pending orders submitted to the Court for consideration, advised Debtors on a regular basis with respect to various matters in connection with these cases, and performed all necessary professional services which are described and narrated in detail below.

#### Summary of Services by Project

The services rendered by PSZY&J during the Interim Period can be grouped into the categories set forth below. PSZY&J attempted to place the services provided in the category that best relates to such services. However, because certain services may relate to one or more categories, services pertaining to one category may in fact be included in another category.

These services performed, by categories, are generally described below, with a more detailed

identification of the actual services provided set forth on the attached Exhibit A. Exhibit A identifies the attorneys and paraprofessionals who rendered services relating to each category, along with the number of hours for each individual and the total compensation sought for each category.

# A. Asset Disposition

This category relates to services provided in connection with the disposition of Debtors' assets. In that regard, during the Interim Period, PSZY&J, among other things: (1) worked on the Debtors' second quarterly report of asset sales; and (2) reviewed a stipulation resolving objections to the Debtors' proposed sale of the Dragon Court Lease.

Fees: \$560.00;

Total hours: 2.00

# B. Bankruptev Litigation

This category relates to services provided in connection with litigation issues relating to Debtors' bankruptcy cases. In that regard, during the Interim Period PSZY&J, among other things: (1) prepared for and appeared at an omnibus hearing on January 3, 2002; (2) reviewed the joint motion of the Asbestos Property Damage and Personal Injury Committees for authority to prosecute fraudulent conveyance actions; (3) worked on a motion to dismiss the Zonolite adversary proceeding; (4) worked on a motion to modify a preliminary injunction related to protecting the Debtors against certain litigation, including litigation wherein the Debtors might have to indemnify other parties; (5) performed work related to a complaint regarding National and Union Fire Insurance Company of Pittsburgh; (6) worked on a motion to acquire the assets of Addiment, Inc.; (7) worked on a motion for the *pro hac vice* admission of

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Michelle Browdy; (8) prepared for and appeared at an omnibus hearing on January 29, 2002; (9)

researched the status and communicated with parties regarding the assignment of fee examiners

in asbestos cases; and (10) prepared Agenda Notices and hearing notebooks.

Fees: \$29,680.00;

Total hours: 132.10

C. **Case Administration** 

Time billed to this category relates to administrative matters. In that regard,

during the Interim Period PSZY&J, among other things: (1) communicated with various parties

interested in these cases and addressed issues regarding same; (2) maintained a current document

system and maintained and circulated memoranda setting forth the critical dates and deadlines in

Debtors' cases: and (3) assisted in coordinating the efforts of Debtors' various professionals to

avoid duplication of efforts.

Fees: \$3,831.50;

Total hours: 52.30

Claims Administration/Objections D.

This category relates to services provided in connection with claims

administration and claims objections issues. During the Interim Period PSZY&J, among other

things: (1) communicated with the Debtors' creditors regarding the bar date and the filing of

proofs of claim; (2) forwarded a notice of claims transfers; and (3) worked on the Debtors'

second quarterly report of settlements.

Fees: \$476.00;

Total hours: 2.50

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> E. Compensation of Professionals

This category relates to services provided in connection with issues related to

compensation of professionals. During the Interim Period, PSZY&J among other things:

(1) worked on the modification of the Administrative Order governing interim compensation

procedures; (2) reviewed and revised PSZY&J's second quarterly (July 1, 2002 through

September 30, 2001) fee application; (3) finalized PSZY&J's eighth monthly (November 2001)

fee application; (4) drafted, filed and served PSZY&J's ninth monthly (December 2001) fee

application; and (5) reviewed, analyzed and addressed issues regarding the filing and service of

the fee applications of Debtors' other professionals.

Fees: \$9,166.00;

Total hours: 39.00

**Executory Contracts** H,

This category relates to services provided in connection with issues related to

the Debtors' executory contracts. During the Interim Period PSZY&J, among other things: (1)

reviewed and revised a motion to further extend the time within which to assume or reject

nonresidential real property leases; (2) communicated with parties on lease issues; and (3)

reviewed a stipulation resolving a motion to assume, assign and sell a lease.

Fees: \$764.00;

Total hours: 3.70

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G. Financial Filings

This category relates to services provided in connection with Debtors' schedules

of assets and liabilities and statement of financial affairs and monthly operating reports. During

the Interim Period PSZY&J reviewed and revised amendments to the statements of financial

affairs of certain Debtors.

Fees: \$1,316.00;

Total hours: 4.70

Litigation (Non-Bankruptcy) H.

This category relates to services provided in connection with litigation outside of

the Bankruptcy Court. During the Interim Period PSZY&J, among other things, reviewed and

discussed, among its attorneys, a proposed order staying tobacco litigation.

Fees: \$168.00;

Total hours: .60

I. **Operations** 

This category relates to services provided in connection the Debtors' operations.

During the Interim Period PSZY&J prepared, served and filed the November 2001 monthly

operating report and performed work related to the Debtors' document retention policy.

Fees: \$440.00;

Total hours: 2.20

# J. Plan/Disclosure Statement

This category relates to services provided relating to plan and disclosure statements issues. During the Interim Period PSZY&J prepared, reviewed and revised a motion to extend the exclusivity period.

Fees: \$444.00;

Total hours: 2.10

# K. Retention of Professionals

This category relates to services provided in connection with obtaining approval of various professionals' employment. During the Interim Period, PSZY&J, among other things, --addressed issues regarding the retention of professionals, including preparation of a motion to retain PriceWaterhouseCoopers as accountants.

Fees: \$1,511.00;

Total hours: 6.40

# Valuation of Services

Attorneys and paraprofessionals of PSZY&J expended a total of 247.60 hours in connection with these cases during the Interim Period, as follows:

Name of Professional	Hourly	Total Hours	Total
Individual	Billing Rate	Billed	Compensation
Laura Davis Jones	\$550.00	15.50	\$ 8,525.00
Ira D. Kharasch	\$480.00	.90	\$ 432.00
Hamid R. Rafatjoo	\$330.00	5.20	\$ 1,716.00
David W. Carickhoff	\$280.00	94.20	\$26,376.00
	\$140.00	9.40	\$ 1,316.00
Rachel S. Lowy	\$260.00	1.10	\$ 286.00
Michael P. Migliore	\$215.00	1.00	\$ 215.00
Laurie A. Gilbert	\$125.00	1.40	\$ 175.00
Patricia E. Cuniff	\$120.00	50.40	\$ 6,048.00
Cheryl A. Knotts	\$120.00	.10	\$ 12.00

Name of Professional Individual	Hourly Billing Rate	Total Hours Billed	Total Compensation
Donna C. Crossan	\$ 55.00	11.50	\$ 632.50
Violet E. Mobley	\$ 50.00	34.70	\$ 1,735.00
Jason M. Griffith	\$ 40.00	.40	\$ 16.00
Christina M. Shaeffer	\$ 40.00	15.30	\$ 612.00
Charles J. Bouzoukis	\$ 40.00	6.50	\$ 260.00

Grand Total \$48,356.50 Total Hours 247.60 Blended Rate \$195.30

The nature of work performed by these persons is fully set forth in Exhibit A attached hereto.

These are PSZY&J's normal hourly rates for work of this character. The reasonable value of the services rendered by PSZY&J to Debtors during the Interim Period is \$48,356.50.

In accordance with the factors enumerated in Section 330 of the Bankruptcy Code, it is respectfully submitted that the amount requested by PSZY&J is fair and reasonable given (a) the complexity of these cases, (b) the time expended, (c) the nature and extent of the services rendered, (d) the value of such services, and (e) the costs of comparable services other than in a case under this title. Moreover, PSZY&J has reviewed the requirements of the Delaware Local Rules and believes that this Application complies with such Rules.

WHEREFORE, PSZY&J respectfully requests that the Court approve, for the period January 1, 2002, through January 31, 2002, an allowance be made to PSZY&J in the sum of \$48,356.50 as compensation for necessary professional services rendered, and the sum of \$38,671.08 for reimbursement of actual necessary costs and expenses, for a total of \$87,027.58, that such sums be authorized for payment pursuant to the Administrative Order; and provide PSZY&J such other and further relief as this Court may deem just and proper.

Dated: March 29, 2002

PACHULSKI, STANG, ZIEHL, YOUNG & JONES P.C.

Laura Davis Jones (Bar No. 2436)

Hamid R. Rafatjoo (California Bar No. 181564)

David W. Carickhoff Jr. (Bar No. 3715)

919 North Market Street, 16th Floor

P.O. Box 8705

Wilmington, DE 19899-8705 (Courier 19801)

Telephone: (302) 652-4100 Facsimile: (302) 652-4400

Co-counsel for Debtors and Debtors in Possession

#### VERIFICATION

STATE OF DELAWARE

COUNTY OF NEW CASTLE:

David W. Carickhoff, Jr., after being duly sworn according to law, deposes and says:

- I am an associate with the applicant law firm Pachulski, Stang, Ziehl, Young & Jones P.C., and have been admitted to appear before this Court.
- I have personally performed many of the legal services rendered by Pachulski, Stang, Ziehl, Young & Jones P.C. as counsel to the Debtors and am thoroughly familiar with the other work performed on behalf of the Debtors by the lawyers and paraprofessionals of PSZY&J.
- I have reviewed the foregoing Application and the facts set forth therein are true c) and correct to the best of my knowledge, information and belief. Moreover, I have reviewed the Local Bankruptcy Rules for the District of Delaware, and submit that the Application substantially complies with such rules.

SWORN AND SUBSCRIBED

before me this \_\_day of (

My Commission Expires: 05

# PACHULSKI, STANG, ZIEHL, YOUNG & JONES P.C.

10100 Santa Monica Boulevard 11th Floor Los Angeles, CA 90067

January 31, 2002

Invoice Number 50990

91100 00001

HRR

David B. Siegel, Esquire W.R. Grace and Co. 7500 Grace Drive Columbia, MD 21044

Balance forward as of last invoice, dated: January 26, 2002
Payments received since last invoice, last payment received -- February 28, 2002

Net balance forward

\$165,857.00
\$115,639.50

\$50,217.50

Re: W.R. Grace and Co.

*********	Stateme	ent of Professional Services Rendered Through	01/31/2002	, and a second s	
	ASSET	F DISPOSITION [B130]	Hours	Rate	Amount
01/30/02	DWC	Call with Robert Wolf re: interest in purchasing Debtors' 17 acre tract in New Jersey and environmental issues in connection therewith.	0.40	280.00	\$112.00
01/31/02	DWC	Review stipulation resolving objections to Debtors' proposed sale of Dragon Court Lease (.4); draft cert. of counsel re: same (.4); review S. Schwartz comments to same (.1); address filing and service thereof (.3).	1.20	280.00	\$336.00
01/31/02	DWC	Review and execute Debtors' 2nd quarterly report of asset sales (.2); address filing and service thereof (.2)	0.40	280.00 —	\$112.00
	Task (	Code Total	2.00		\$560.00
	BANK	RUPTCY LITIGATION [L430]			
01/02/02	DWC	Call with Bill Chipman re: hearing on Exxon matter	0.20	280.00	\$56.00
01/02/02	DMC	Calls (3x) with Jan Baer re: matters going forward for tomorrow's hearing.	0.30	280.00	\$84.00
01/02/02	DWC	Calls with Jay Kapp re: matters going forward tomorrow.	0.30	280.00	\$84.00
01/02/02	DWC	Calls with David Bernick, Laura Jones, Jay Kapp and Committee counsel re: matters going forward tomorrow and call from chambers.	1.60	280.00	\$448.00
01/02/02	DWC	Address impromptu conference call with Committee counsel re: hearing and chamber's comments.	0.60	280.00	\$168.00
01/02/02	DWC	Prepare for hearing tomorrow.	5.40	280.00	\$1,512.00
01/02/02	DWC	Calls to Perry Whitimer and Kathy Miller (counsel to Robert Locke) (.2), Counsel for Gloria Munoz (.2); counsel for State of Michigan (.2); counsel for Ellisons (.2); counsel for Perry Class; and Alice Smolker (.1) re: hearing	0.90	280.00	\$252.00

Invoice 1	umber	Case 01-01139-AMC Doc 2182-1 Filed 06/06/02	Page 25	of 31	Page	2
		tomorrow re: Debtors' Motion to Modify Preliminary				
01/02/02	PEC	Injunction Gather documents for 1/3/02 Hearing per David	0.50	120.00		\$60.00
01/02/02	LDJ	Carickhoff's request Telephone conference with David Bernick, Esq.; Judge Fitzgerald's clerk re: agenda for 1/3 hearings; status of matters going forward	0.20	550.00		\$110.00
01/02/02	LDJ	Telephone conference with David Carickhoff, Esq. re: 1/3 hearings; pending agenda	0.30	550.00		\$165.00
01/02/02	LDJ	Review documents; pending matters in preparation for 1/3 hearings	2.80	550.00		\$1,540.00
01/02/02	LDJ	Telephone conference with David Bernick, Esq.; Matthew Zaleski, Esq.; Lewis Kruger, Esq. Peter Lockwood, Esq.; Scott Bana, Esq.; David Carickhoff, Esq., re: agenda for	1.00	550.00		\$550.00
01/02/02	DWC	1/3 hearings; pending matters status Calls (3x) with Judge's chambers re: agenda notice and matters going forward	0.60	280.00		\$168.00
01/03/02	DWC	Prepare for hearing of 1/3/02	1.00	280.00		\$280.00
01/03/02	DWC	Attend hearing.	5.50	280.00		\$1,540.00
01/03/02	LDJ	Review status report and proposal for litigation in preparation for 1/3 hearings re: case status; omnibus matters	1.80	550.00		\$990.00
01/03/02	LDJ	Review Debtors' Motion to Modify Preliminary Injunction and pending objections in preparation for 1/3 hearing	1.40	550.00		\$770.00
01/03/02	LDJ	Review Joint Motion of Asbestos Property Damage and Personal Injury Committees for Authority to Prosecute Fraudulent Convenance Actions, and related responses, in	0.60	550.00		\$330.00
01/03/02	LDJ	preparation for 1/3 hearing Attend hearing re: Motion to Modify Preliminary Injunction; Smolker Motion for Relief from Stay; Asbestos Committees' Motion to pursue fraudulent conveyance matters; various creditor motions re: lease matters and automatic stay; Asbestos Committee Motion to Employ	5.50	550.00		\$3,025.00
01/03/02	LDJ	Bankruptcy Consultant; omnibus matters Telephone conference with James Sprayregen, Esq. re: results of 1/3 hearings; going forward strategy	0.20	550.00		\$110.00
01/03/02	DWC	Travel to Pittsburgh for hearing (4 hours); travel from Pittsburgh returning from hearing (5.4 hours) Total of 9.4 hours (billed at 1/2 rate).	9.40	140.00		\$1,316.00
01/04/02	DWC	Call with R. Higgins re: Debtors' Motion to Dismiss Zonolite Action and scheduling matters in connection therewith.	0.20	280.00		\$56.00
01/04/02	DWC	Draft notice of Motion to Dismiss Zonolite Adversary Complaint and address filing and service thereof.	0.60	280.00		\$168.00
01/06/02	DWC	Draft memo regarding results of January 3, 2002 hearing and Judge Fitzgerald Procedural Policies.	2.50	280.00		\$700.00
01/07/02	DWC	Call with David Faust re: January 3 hearing on Motion to modify preliminary injunction and State of Michigan's objection thereto.	0.30	280.00		\$84.00
01/07/02	DWC	Finalize memo regarding results of Janaury 3, 2002 hearing and Judge Fitzgerald Procedural Policies.Draft memo regarding results of Janaury 3, 2002 hearing and Judge Fitzgerald Procedural Policies (1.5); call with Jay Kapp re: his comments to the memo (.2).	1.70	280.00		\$476.00
01/08/02	DWC	Call with Jan Baer re: proposed orders regarding Debtors' Motion to modify the preliminary injunction.	0.20	280.00		\$56.00
01/08/02	DWC	Call with Will Sparks re: results of January 3 hearing.	0.20	280.00		\$56.00
01/10/02	DWC	Draft Notice of Omnibus hearing dates (.8) and address filing and service thereof (.4)	1.20	280.00		\$336.00

Invoice r	ıumber	Са <u>зе 0</u> 1-01139-АМС <sub>00</sub> Doc 2182-1 Filed 06/0	6/02	Page 2	6 of 31	Page 3
01/10/02	DWC	Review Order to modify preliminary injunction (.3); draft cert. of counsel re: same (.6); address filing and service		1.20	280.00	\$336.00
01/10/02	DWC	thereof (.3) Review Order covering several rulings of January 3rd hearing (.3); draft cert. of counsel re: same (.6); address filing and service thereof (.3)		1.20	280.00	\$336.00
01/10/02	DWC	Review affidavit of Mark Shelnitz re: Bertacchi indemnification (.4) and address filing and service thereof		0.60	280.00	\$168.00
01/15/02	PEC	(.2) Draft Agenda Notice for 1/29/02 Hearing.		2.10	120.00	\$252.00
01/15/02	VEM	Prepare hearing notebook for hearing on W.R. Grace.		3.00	50.00	\$150.00
01/15/02	MPM	Telephone call to R. Booth to confirm assignment of fee		0.20	215.00	\$43.00
01/10/01	*****	examiner in Armstrong World Industries case				
01/15/02	MPM	Review docket to determine local counsel for Armstrong World Industries		0.10	215.00	\$21.50
01/15/02	MPM	Review Armstrong World Industries docket to determine if fee examiner has been appointed		0.20	215.00	\$43.00
01/15/02	MPM	Telephone call to K. Kansa at Sidley Austin to discuss whether fee examiner has been appointed in related asbestos cases before Judge Wolin		0.20	215.00	\$43.00
01/15/02	MPM	Telephone call to David Hurst at Skadden to discuss whether fee examiner has been appointed in Owens-		0.20	215.00	\$43.00
01/15/02	MPM	Corning case Draft email to Sam Schwarz at Kirkland & Ellis regarding status of fee examiner appiontments in asbestos cases		0.10	215.00	\$21.50
01/16/02	RSL	assigned to Judge Wolin Multiple phone calls with Sam Schwartz re: TRO, motion for preliminary injunction (.3); conference with LDJ re: same (.2); telephone to Rachel Bello re: hearing date for		0.70	260.00	\$182.00
01/16/02	PEC	same (.1); e-mail DWC and PEC re: fiiling TRO (.1) Review docket and revise Agenda Notice for 1/29/02 Hearing. Forward to David Carickhoff and Sam Schwartz		1.10	120.00	\$132.00
		for comments.		,	<b>70.00</b>	01.55.00
01/16/02	VEM	Prepare hearing notebook for hearing on W.R. Grace.		3.10	50.00	\$155.00
01/16/02	DWC	Draft e-mail to P. Cuniff re: preparation of agenda notice for 1/29 hearing.		0.10	280.00	\$28.00 \$1,036.00
01/17/02	DWC	Prepare agenda notice for January 29, 2002 hearing (2.0); revise as per Kirkland and Ellis comments (.8); calls with Sam Schwartz (.2) and Jay Kapp (.2) re: same; draft letter to Judge Fitzgerald re: Agenda Notice and new items (.5).		3.70	280.00	31,030.00
01/17/02	DWC	Meet with R. Lowy re: TRO pleadings and review her email re: same (.3); calls (3x) with Sam Schwartz re:  Verified Complaint for Declaratory Judgment and Injunctive Relief and Motion for Preliminary Injunction and TRO (.6); Review and revise Verified Complaint for Declaratory Judgment and Hughes Affidavit and exhibits thereto (3.2); address filing of the same (1.6); review and revise Motion for Preliminary Injunction and TRO,		8.40	280.00	\$2,352.00
01/17/02	Duc	proposed order and memo in support thereof (2.1); address filing thereof (.6).		0.30	280.00	\$84.00
01/17/02	DWC	Review Judge Fitzgerald's memo re: January 3 hearing and circulate the same.		3.00	50.00	
01/17/02 01/18/02	VEM DWC	Prepare hearing notebook for hearing on W.R. Grace. Call with Rachel Bello at bankruptcy court re: hearing on Motion for TRO and Preliminary Injunction (.2); call with Sam Schwartz re: TRO pleadings (.2); calls (2x) with Mike Davis re: TRO pleadings (.3); e-mail to S. Schwartz and M. Davis re: TRO pleadings (.3); address service of the TRO pleadings (.4)		1.40	280.00	

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Invoice	number	Case 01-01139-AMC Doc 2182-1 Filed 06/06/02	Page 27	of 31	Page	4
01/18/02	PEC	Serve Verified Complaint for Declaratory Judgment and Injuctive Relief regarding National and Union Fire Insurance Company of Pittsburgh (.2); Draft Affidavit of Service (.2) File and serve (.4)	0.80	120.00		\$96.00
01/18/02	PEC	Service (.2) File and serve (.4) Serve Notice of Plaintiff's Motion for Preliminary Injuction & Temporary Restraining Order (.2); Draft Affidavit of Service (.2); File and serve same (.4)	0.80	120.00		\$96.00
01/18/02	DWC	Draft e-mail to Rachel Bello re: preparation of order dismissing motion to create document repository	0.20	280.00		\$56.00
01/22/02	DWC	Calls with Jay Kapp and Sam Schwartz re: agenda notice for January 29 hearing	0.40	280.00		\$112.00
01/22/02	DWC	Review e-mails from W. Sparks re: agenda notice and proposed administrative order and J. Kapp's response to same.	0.40	280.00		\$112.00
01/22/02	DWC	Prepare draft motion for pro hac admission of M. Browdy.	0.20	280.00		\$56.00
01/22/02	DWC	Call with J. Baer and chambers re: proposed orders regarding January 3 rulings.	0.30	280.00		\$84.00
01/22/02	DWC	Call with chambers re: proposed orders in connection with January 3 rulings.	0.20	280.00		\$56.00
01/22/02	DWC	Address S. Mitchell inquiries re: Judge Fitzgerald memo re: Janaury 3 hearing.	0.30	280.00		\$84.00
01/22/02	VEM	Prepare hearing notebook for hearing on W.R. Grace.	2.30	50.00		\$115.00
01/23/02	DWC	Call with R. Higgins re: motion to dismiss adversary complaint.	0.20	280.00		\$56.00
01/23/02	DWC	Prepare draft agenda notice for January 29 hearing	2.50	280.00		\$700.00
01/24/02	DWC	Draft order terminating document repository motion (.8) and calls with co-counsel and chambers re: same (.3)	1,10	280.00		\$308.00
01/24/02	VEM	Prepare hearing notebook for hearing on W.R. Grace.	7.00	50.00		\$350.00
01/24/02	LDJ	Review memo from Frank Perch, Esq. re: appointment of F&E examiner	0.10	550.00		\$55.00
01/25/02	DWC	Review and respond to voice message and e-mails of K.  Miller re: 1/29 hearing	0.40	280.00		\$112.00
01/25/02	DWC	Finalize Agenda Notice for 1/29 hearing (.9) and address filing and service thereof (.2)	1.20	280.00		\$336.00
01/25/02	DWC	Review hearing binders for 1/29 hearing.	0.90	280.00		\$252.00
01/25/02	DWC	Review Third Party Complaint filed by National Union Fire Ins. Co. of Pittsburgh, PA.	0.40	280.00		\$112.00
01/25/02	PEC	Revise and review Agenda Notice for the 1/29/02 Hearing (1.3). Draft service list and Certificate of Service (1.0). File and serve (.4)	2.70	120.00		\$324.00
01/25/02	PEC	File and serve Motion to Acquire Assets of Addiment, Inc (.5). Draft Certificate of Service (.4)	0.80	120.00		\$96.00
01/25/02	DWC	Review and revise motion to purchase Addiment (1.2); draft notice re: same (.4); calls with S. Schwartz re: same (.3); address filing and service thereof (.3)	2.20	280.00		\$616.00
01/25/02	CAK	Telephone call from Lisa Coggins re: Request for 2002 service list	0.10	120.00		\$12.00
01/25/02	VEM	Prepare hearing notebook for hearing on W.R. Grace.	6.50	50.00		\$325.00
01/25/02	DWC	Review US Trustee e-mails re: fee examiner (.2) and discuss the same with co-counsel (.2)	0.40	280.00		\$112.00
01/28/02	DWC	Prepare amended agenda (.8); call with S. Schwartz re: same (.2); review J. Kapp and J. Baer e-mails re: same (.2); address filing and service thereof (.3)	1.50	280.00		\$420.00
01/28/02	DWC	Review Supplemental Response filed by Robert Locke in opposition to motion for preliminary injunction.	0.40	280.00		\$112.00
01/28/02	HRR	Review and analyze notice of agenda.	0.10	330.00		\$33.00
01/28/02	CJB	Prepare hearing notebook for 1/29/02.	3.50	40.00		\$140.00
01/28/02	DCC	Prepare hearing binder due 01-29-02.	4.00	55.00		\$220.00
01/29/02	DWC	Finalize motion to admit Michelle Browdy pro hav vice	0.40	280.00		\$112.00

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		and address filing and service of same.			
01/29/02	DWC	Attend hearing.	3.10	280.00	\$868.0
01/29/02	DWC	Draft memo re: results of hearing.	1.80	280.00	\$504.
01/29/02	DWC	Prepare for hearing.	2.50	280.00	\$700.0
01/29/02	PEC	File and serve Motion of David W. Carickhoff, Jr., for	0.50	120.00	\$60.
		Order Admitting Attorney for the Debtors' Pursuant to Local District Court Rule 83.5(c).			
01/29/02	PEC	Draft Affidavit of Service regarding Motion of David W.	0.50	120.00	\$60.
		Carickhoff for Order Admitting Attorney for the Debtors' Pursuant to Local District Court Rule 83.5(c) (.2); File			
		Affidavit with the Corut (.3)			
01/29/02	PEC	File and serve Debtors' Certification of Counsel re: Docket	0.50	120.00	\$60.
		No. 1414 (Debtors' First Case Management Order) (.5); Draft Affidavit of Service and file with the Court (.4)			
01/29/02	PEC	Draft Affidavit of Service regarding Debtors' Certification	0.50	120.00	\$60
		of Counsel re: Docket No. 1414 (Debtors' First Case			
		Management Order) (.2); File Affidavit with the Court (.3)			
01/29/02	VEM	Prepare hearing notebook for hearing on W.R. Grace.	2.00	50.00	\$100
01/30/02	DWC	Call with Jay Kapp re: memo regarding 1/29 hearing and	0.30	280.00	\$84
01/31/02	DWC	revise memo as per his comments.  Call with J. Kapp re: preparation of scheduling orders.	0.20	280.00	\$56
			122 10	MARAGEMA	\$29,680
	Task C	Code Total	132.10		\$49,6 <b>6</b> 0
٠,	CASE	ADMINISTRATION [B110]		· ·	
01/02/02	DCC	Maintain document control.	1.50	55.00	\$82
01/02/02	HRR	Review and analyze order setting status conference and	0.10	330.00	\$33
01/02/02	11144	case procedures.			
01/02/02	PEC	Update critical dates memo.	1.00	120.00	\$120
01/02/02	PEC	Review daily correspondence and pleadings and forward to	1.10	120.00	\$132
		the appropritate individuals.			r
01/03/02	PEC	Review daily correspondence and pleadings and forward to	0.40	120.00	\$48
		the appropriate individuals.			
01/04/02	PEC	Review daily correspondence and pleadings and forward to	0.50	120.00	\$60
	*	the appropriate individuals.			
01/07/02	DCC	Maintain document control.	3.00	55.00	\$165
01/07/02	CJB	Maintain document control.	2.00	40.00	\$80
01/08/02	DWC	Address information request of co-counsel regarding	0.40	280.00	\$112
		composition of Federal Mogul asbestos claimants			
	~~~	committee.	0.50	120.00	966
01/08/02	PEC	Review daily correspondence and pleadings and forward to	0.50	120.00	\$60
0 1 10 0 10 0	C.TD	the appropriae individuals.	1.00	40.00	\$40
01/09/02	CJB	Maintain document control.	1.00 0.40	40.00	\$16
01/09/02	JMG	Maintain Document Control.	0.40	120.00	\$60
01/09/02	PEC	Review daily correspondence and pleadings and forward tot he appropriae individuals.			
01/09/02	PEC	Update critical dates memo.	0.60	120.00	\$72 \$165
01/10/02	DCC	Maintain document control.	3.00	55.00	\$10. \$60
01/10/02	PEC	Review daily correspondence and pleadings and forward to the appropriate individuals.	0.50	120.00	
01/11/02	PEC	Review daily correspondence and pleadings and forward to the appropriate individuals.	0.60	120.00	\$72
	PEC	Return calls to various creditors regarding status of the	1.10	120.00	\$132
01/11/02		acce and har date			
01/11/02 01/14/02	PEC	case and bar date. Review daily correspondence and pleadings and forward to	0.50	120.00	\$60
			0.50 1.90	120.00 50.00	\$60 \$95

Invoice r	umber	Case 01-01139-AMC Doc 2182-1 Filed 06/06/	/02 Page 29	of 31	Page	6
01/14/02	VEM	Match pleadings with court docket.	5.90	50.00		\$295.00
01/14/02	PEC	Review daily correspondence and pleadings and forward to	0.50	120.00		\$60.00
01/16/02	PEC	the appropriate individuals.  Review daily correspondence and pleadings and forward to	0.80	120.00		\$96.00
		the appropriate individuals.	0.50	120.00		eco oo
01/17/02	PEC	Review daily correspondence and pleadings and forward to the appropriate individuals.	0.50	120.00		\$60.00
01/17/02	PEC	Return calls to various creditors regarding bar date.	1.10	120.00		\$132.00
01/18/02	PEC	Review daily correspondence and pleadings and forward to the appropriate individuals.	0.50	120.00		\$60.00
01/22/02	PEC	Review docket and update critical dates memo.	1.30	120.00		\$156.00
01/22/02	PEC	Review daily correspondence and pleadings and forward to	0.50	120.00		\$60.00
01/23/02	PEC	the appropriate individuals.  Review daily correspondence and pleadings and forward to	0.60	120.00		\$72.00
01/24/02	PEC	the appropriate individuals.  Review daily correspondence and pleadings and forward to the appropriate individuals.	0.50	120.00		\$60.00
01/28/02	CMS	Maintain Document Control.	4.20	40.00		\$168.00
01/28/02	PEC	Review daily correspondence and pleadings and forward to	0.60	120.00		\$72.00
01/00/03	CME	the appropriate individuals.	4.30	40.00		\$172.00
01/29/02	CMS	Maintain Document Control.	0.80	120.00		\$96.00
01/29/02	PEC PEC	Review docket and update critical dates memo.  Review daily correspondence and pleadings and forward to	0.40	120.00		\$48.00
01/29/02	PEC	the appropriate individuals.	0.10	120100		ψ.σ,σ
01/30/02	CMS	Maintain Document Control.	6.80	40.00		\$272.00
01/30/02	PEC	Respond to request of Aidie Hammond and forward the	0.40	120.00	•	\$48.00
01/30/02	PEC	appropriate order for her review.  Review daily correspondence and pleadings and forward to	0.50	120.00		\$60.00
01/31/02	PEC	the appropriate individuals.  Review daily correspondence and pleading and circulate to	0.50	120.00		\$60.00
01/31/02	PEC	the appropriate individuals.  Review daily correspondence and pleading and circulate to the appropriate individuals.	1.00	120.00		\$120.00
	Task (	Code Total	52.30			\$3,831.50
	CLAII	MS ADMIN/OBJECTIONS [B310]				
01/00/02	DTC	Forward Notice of Transfer Claims to Rust Consultants.	0.40	120.00		\$48.00
01/09/02 01/11/02	PEC DWC	Call with Joe Ambrosian re: Debtors' schedules and statements and his clients claim.	0.20	280.00		\$56.00
01/18/02	DWC	Review and respond to message of Jack Rubin re: bar date.	0.10	280.00		\$28.00
01/13/02	PEC	Return calls to various potential creditors regarding the bar date and case status.	1.00	120.00		\$120.00
01/24/02	DWC	Address creditor inquiries (3) re: bar date and claims generally	0.40	280.00		\$112.00
01/31/02	DWC	Review and execute Debtors' 2nd quarterly report of settlements (.2); address filing and service thereof (.2)	0.40	280.00		\$112.00
	Task (	Code Total	2.50			\$476.00
	COM	PENSATION PROF. [B160]				
01/02/02	DWC	Review November fee application of Casner & Edwards	0.50	280.00		\$140.00
01/02/02	DWC	and prepare the same for filing Review November fee application of Holme Roberts and	0.50	280.00		\$140.00
01/02/02	DWC	prepare the same for filing Revise proposed Amended Administrative Order re:	0.50	280.00		\$140.00

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		interim professional compensation as per committee comments.				·
01/02/02	HRR	Telephone conference with MaryRitchie Johnson	0.10	330.00		\$33.00
01/02/02	HRR	regarding quarterly fee application.  Telephone conference with P. Cuniff regarding filing of	0.10	330.00		\$33.00
01/04/02	DWC	quarterly fee application.  Call with R. Higgins re: Kirkland & Ellis October fee application and preparation cert. of no objection in connection therewith.	0.20	280.00		\$56.00
01/04/02	DWC	Review Wallace King's November fee application and address filing and service thereof.	0.50	280.00		\$140.00
01/07/02	DWC	Call with Arlene Krieger re: Amened Administrative Order and her comments thereto.	0.30	280.00		\$84.00
01/07/02	DWC	Draft Cert of No Objection re: Kirkland and Ellis October	0.50	280.00		\$140.00
01/07/02	IDK	Fee App and address filing and service thereof. Emails to HRR and MRJ last week re 11/01 and Quarterly status and issues	0.30	480.00		\$144.00
01/07/02	LAG	Email and telephone conferences regarding issues and	0.20	125.00		\$25.00
01/07/02	LAG	timing of fee application.  Review administrative order and scheduling regarding	0.20	125.00	,	\$25.00
01/08/02	DWC	status of interim fee application. Further revise Amended Administrative Order in light of Judge Fitzgerald's comments at the January 3, 2002	2.50	280.00		\$700.00
		hearing (1.7); address Arlene Krieger's comments re: same (.2); e-mail to co-counsel regarding revisions (.2); call with R. Higgins regarding the same (.2); call with S. Schwartz re: same (.2).				•
01/08/02	DWC	Review and revise Pachulski Stang second quarterly fee application and address filing and service thereof.	0.40	280.00		\$112.00
01/08/02	DWC	Review certs. of no objection re: Wallace King October fee app., Pitney Hardin October fee app., and Nelson Mullins October fee app. and address filing and service thereof.	0.60	280.00		\$168.00
01/08/02	DWC	Call with Jay Kapp re: his comments to the latest version of the Amended Administrative Order.	0.20	280.00		\$56.00
01/08/02	DWC	Review Wallace King November fee application and address filing and service thereof.	0.50	280.00		\$140.00
01/08/02	DWC	Review Casner & Edwards November fee application and address filing and service thereof.	0.50	280.00		\$140.00
01/08/02	DWC	Review Holme Roberts November fee application and address filing and service thereof.	0.50	280.00		\$140.00
01/08/02	DWC	Review Pitney Hardin Quarterly Fee Application for period of July to September 2001 and address filing and service thereof.	0.50	280.00		\$140.00
01/08/02	PEC	Draft Notice of PSZYJ Second Quarterly Fee Application and Certificate of Service (.5); Serve and prepare Fee	1.00	120.00		\$120.00
01/08/02	LAG	Application for e-file (.5) Email and telephone conferences regarding issues and timing of fee application.	0.20	125.00		\$25.00
01/08/02	LDJ	Review and finalize second quarterly fee app (July 1 - Sept. 30, 2001)	0.30	550.00		\$165.00
01/08/92	LDJ	Conference with David Carickhoff, Esq. re: amended administrative fee order	0.20	550.00		\$110.00
01/09/02	PEC	Draft Notice and Affidavit of Service for Wallace King Marraro & Branson November Fee Application	0.50	120.00		\$60.00
01/09/02	PEC	Draft Notice and Certificate of Service for Holmes Roberts & Owen November Fee Application.	0.50	120.00		\$60.00
01/09/02	PEC	Draft Notice and Certificate of Service for Casner &	0.50	120.00		\$60.00
01/09/02	PEC	Edwards November Fee Application. Draft Notice and Certificate of Service for Pitney Hardin	0.50	120.00		\$60.00

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		Winn & Canal for Sagar d Quartarly Foo Amplication				
01/10/02	IDK	Kipp & Szuch for Second Quarterly Fee Application.  Emails to and from HRR re issues - status of all 3	0.20	480.00		\$96.00
01/10/02	DWC	quarterlies, Oct CNO and Nov app Call with Bob Murphy of Casner & Edwards re: Amended	0.30	280.00		\$84.00
01/10/02	DWC	Administrative Order. Call with Doug Cameron of Reed Smith re: Amended	0.20	280.00		\$56.00
01/10/02	DWC	Administrative Order.  Draft letter to professionals in case re: proposed Amended  Administrative Order.	0.90	280.00		\$252.00
01/10/02	PEC	Draft Affidavit of Service for Notice of Omnibus Hearing Dates (.2); File and serve (.8)	1.00	120.00		\$120.00
01/11/02	DWC	Call with Jeff Waxman (equity committee) re: proposed administrative order.	0.10	280.00		\$28.00
01/11/02	RSL	Telephone from Sam Schwartz re: OCP quarterly report and supplemental affidavit of Stepentoe; return call for same	0.20	260.00		\$52.00
01/11/02	RSL	Review OCP quarterly accounting and prepare to file	0.20	260.00		\$52.00
01/11/02	PEC	File and serve Debtor's Statement of Amounts Paid to Ordinary Course Professionals From April 2, 2001 Through December 31, 2001 (.8); Draft Affidavit of Service (.2)	0.80	120.00		\$96.00
01/14/02	DWC	Review and respond to H. Rafatjoo questions re: proposed administrative order.	0.20	280.00		\$56.00
01/14/02	HRR	Review and revise eighth fee application.	1.30	330.00		\$429.00
01/14/02	HRR	Conference with Ira D. Kharasch regarding fee applications.	0.10	330.00		\$33.00
01/15/02	HRR	Review and analyze fee issues.	0.20	330.00		\$66.00
01/15/02	HRR	Telephone conference with Ira D. Kharasch regarding fee issues.	0.10	330.00		\$33.00
01/15/02	HRR	Telephone conference with MaryRitchie Johnson regarding fee application.	0.10	330.00		\$33.00
01/16/02	HRR	Telephone conference with P. Cuniff regarding certificate of no objection for fee application.	0.10	330.00		\$33.00
01/16/02	HRR	Review and analyze fee issues.	0.30	330.00		\$99.00
01/16/02	HRR	Draft letter to M. Lichty regarding payment of fees.	0.20	330.00		\$66.00
01/16/02	LAG	Email and telephone conferences regarding issues and timing of fee application.	0.20	125.00		\$25.00
01/16/02	LAG	Review administrative order and scheduling regarding status of interim fee application.	0.20	125.00		\$25.00
01/17/02	DWC	Call with R. Higgins re: Kirkland & Ellis November fee application	0.20	280.00		\$56.00
01/17/02	PEC	Draft Certificate of No Objection regarding Motion to Remove Actions and Certificate of Service. File and serve.	0.80	120.00		\$96.00
01/18/02	DWC	Review and execute Cert. of No Objection re: Kirkland & Ellis November fee application.	0.20	280.00		\$56.00
01/18/02	PEC	Draft Certificate of No Objection and Certificate of Service regarding K&E November Fee Application (.4). File and serve (.4).	0.80	120.00		\$96.00
01/22/02	HRR	Telephone conference with MaryRitchie Johnson regarding filing of fee application.	0.10	330.00		\$33.00
01/22/02	IDK	Emails and teleconferences with LDJ, HRR and MRJ re 11/01 fee app issues - timing	. 0.20	480.00		\$96.00
01/22/02	DWC	Review and revise PSZYJ November fee application (.3) and address filing and service thereof (.2)	0.50	280.00		\$140.00
01/22/02	LDJ	Review and finalize interim fee app (Nov. 2001)	0.30	550.00		\$165.00
01/23/02	HRR	Telephone call from and to Ira D. Kharasch regarding fee applications.	0.10	330.00		\$33.00
01/23/02	HRR	Review and analyze fee application of Stroock	0.10	330.00		\$33.00
01/23/02	HRR	Telephone conference with MaryRitchie Johnson	0.10	330.00	ı	\$33.00